



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

June 9, 2023

**BY E-MAIL**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re:    *United States v. Prince Wareham, 11 Cr. 912 (RMB)***

Dear Judge Berman:

The Government writes to request an extension of the deadline to file its sentencing submission in the above-captioned case. The Government's submission presently is due on Monday, June 12, 2023. The Probation Office ("Probation"), however, is not scheduled to issue the final pre-sentence report ("PSR") until Friday, June 16, 2023. In the initial PSR, Probation raised an issue with the Guidelines calculation set forth in the plea agreement. The Government has objected to Probation's calculation. Before filing a sentencing submission, the Government would like to see (i) how Probation resolves the Guidelines issue and, (ii) Probation's sentencing recommendation. Accordingly, the Government requests a one-week extension, until June 19, 2023 to file its sentencing submission. Such an extension will give the Government time to review the final PSR before filing its submission.

Defense counsel consents to this extension, but does not consent to an adjournment of the sentencing date.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By:   
Maggie Lynaugh  
Assistant United States Attorney  
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**The Government's requested extension  
is granted. The sentencing submission  
will be due on June 19, 2023.**

**SO ORDERED:**  
Date: 6/9/2023

**Richard M. Berman, U.S.D.J.**